

10 JAN 1993

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

IN THE MATTER OF:	)	Order No. 93-06
	)	
A&W Smelters and Refiners, Inc.	)	ADMINISTRATIVE ORDER
12040 E. Florence Avenue	)	PURSUANT TO SECTION 106
Santa Fe Springs, CA 90670	)	OF THE COMPREHENSIVE
	)	ENVIRONMENTAL RESPONSE,
Respondents:	)	COMPENSATION, AND
	)	LIABILITY ACT OF 1980
A&W Smelters and Refiners	)	as amended, 42 U.S.C.
John A. Alexander	)	Section 9606(a)
Daryl Westerfeld	)	

PREAMBLE

1. This Administrative Order ("Order") is issued on this date to the Respondent, pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. Section 9606(a), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA"), delegated to the Administrator of the United States Environmental Protection Agency ("U.S. EPA") by Executive Order No. 12580, January 23, 1987, 52 Federal Register 2923, further delegated to the EPA Regional Administrators by U.S. EPA Delegation Nos. 14-14-A and 14-14-B, and further redelegated to the Director, Hazardous Waste Management Division by Region IX Delegations 1290.41 and 1290.42.

2. The State of California been notified of the issuance of this Order as required by Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a).

1           3. This Order requires the Respondent to undertake and  
2 complete removal of approximately 543 drums of solid materials,  
3 containing elevated concentrations of lead, to abate an imminent  
4 and substantial endangerment to the public health or welfare or  
5 the environment that may be presented by the actual or threatened  
6 release of a hazardous substance.

7                                   FINDINGS OF FACT

8           Based on available information, including the Administrative  
9 Record in this matter, U.S. EPA hereby finds:

10           4. Location of Drums

11           The approximately 543 drums in question are currently in  
12 temporary storage at the Appropriate Technology II (App Tech)  
13 facility located on 1700 Maxwell Road, Chula Vista, California  
14 91911.

15           5. Respondents

16           A&W Smelters and Refiners  
17           12040 E. Florence Ave.  
18           Santa Fe Springs, CA 90670  
19           PH# (310) 944-6215  
20           Fax# (301) 944-7198

21           John A. Alexander  
22           12040 E. Florence Ave.  
23           Santa Fe Springs, CA 90670  
24           PH# (310) 944-6215  
25           Fax# (310) 944-7198

26           Daryl Westerfeld (President)  
27           2601 Aland Avenue  
28           Lancaster, CA 93534  
29           PH# (805) 943-6076  
30           PH# (805) 824-2656  
31           Fax# (805) 944-7198

1                   6. Incident / Release Characteristics

2           During the month of December 1992, approximately 543 drums  
3 of lead contaminated materials were transported by L&Z Trucking  
4 of San Ysidro, California, aboard seven trucks to the United  
5 States/Mexican border from the A&W Smelters and Refiners facility  
6 located outside of Mohave, California (SE1/4, Section 32, T11N,  
7 R12W, SBM, in Kern County, California). L&Z Trucking was not a  
8 certified hazardous waste or hazardous substance approved  
9 transporter by the California Highway Patrol. Three out of the  
10 seven loads entered Mexico and were seized by the Mexican Customs  
11 Service. Four out of the seven loads were impounded by the U.S.  
12 Customs Service and then sent to the L&Z trucking storage yard  
13 located in San Ysidro, California.

14           On January 11, 1993, the Environmental Protection Agency  
15 formally notified A&W Smelters and Refiners through their legal  
16 counsel, Mr. Matthew Nasuti, that the Mexican Customs Service was  
17 returning the impounded trucks to the United States on January  
18 14, 1993. EPA proposed to A&W Smelter and Refiners to allow L&Z  
19 Trucking to transport all seven trucks back to the Mohave  
20 facility. To allow this action to occur, EPA requested the  
21 State of California Environmental Protection Agency (Cal-EPA) and  
22 the California Highway Patrol to grant a Hazardous Waste Facility  
23 Permit variance to L&Z. In addition, EPA and the Cal-EPA granted  
24 a variance to allow the Mohave facility to store hazardous waste

1 and substance pursuant to the Resource Conservation and Recovery  
2 Act, as amended (RCRA).

3 In the evening of January 13, 1993, A&W Smelter and Refining  
4 informed EPA through their legal counsel that arrangements with  
5 L&Z Trucking could not be arranged. EPA informed A&W Smelter and  
6 Refining that because they could not arrange appropriate  
7 transportation, EPA would consider the trucks and their contents  
8 abandoned. Therefore, EPA would cause the three trucks returning  
9 from Mexico and the four staged trucks at L&Z to be transported  
10 temporarily to Appropriate Technologies II, Chula Vista,  
11 California, an EPA approved Storage Facility. On January 14,  
12 1993, at approximately 0900 hrs, the three Mexican impounded  
13 trucks entered the United States Customs facility located at San  
14 Ysidro, California. EPA On-Scene-Coordinator, Robert Bornstein,  
15 with approval from EPA Region IX, contracted Disposal Control  
16 Service of Upland, California to perform the transportation of  
17 all of the impounded trucks to Appropriate Technologies. The  
18 California Highway Patrol granted variances to EPA to allow the  
19 L&Z Trailers to travel to the facility. All of the trucks were  
20 properly manifested pursuant to RCRA and Department of  
21 Transportation regulations governing the transportation of  
22 hazardous waste.

23 7. Quantities and Types of Substance Present

24 Random, representative samples from the approximately 543  
25 drums were collected by San Diego County officials at the U.S.

1 Customs facility and submitted to Southern California Laboratory,  
2 an EPA approved laboratory. Laboratory results revealed that the  
3 contents of the drums contain elevated concentrations of lead up  
4 to 2 % (20,000 parts per million). The material exhibited the  
5 characteristic of Toxicity through the Total Concentrate Leachate  
6 Procedure (TCLP) analysis of greater than 5.0 milligrams per  
7 liter (> 5.0 mg/l) pursuant to CFR 261.24 for lead (D008). In  
8 addition, elevated concentrations of zinc and copper were  
9 detected as well as detectable concentrations of polychlorinated  
10 biphenyls (PCBs).

#### 11 8. Threats to Public Health and Welfare

12 Lead and lead compounds are defined as hazardous substances  
13 pursuant to the Comprehensive Environmental Response,  
14 Compensation, and Liability Act of 1980, as amended (CERCLA), 40  
15 CFR Section 302.4. Samples taken from the drums tested greater  
16 than 20,000 ppm for lead. At these concentrations, lead is  
17 universally considered a risk to human health, especially  
18 children.

19 Should these drums be abandoned and their contents released,  
20 soil contamination would occur. Soil Clean-up Action Levels are  
21 commonly in the 500-600 ppm range. The elevated lead  
22 concentrations found in the contents of these drums pose a  
23 significant health hazard to the local population.

24 The United States Department of Health and Human Services,  
25 Public Health Service, National Institute for Occupational Safety

1 and Health classifies lead as a potential human carcinogen. The  
2 ingestion of lead by humans is known to cause damage to the  
3 kidneys and central nervous system and cause anemia. High levels  
4 of lead within the blood stream of children can also cause severe  
5 learning disabilities and health disorders.

6 9. Threats to the Environment

7 The abandonment of these drums and any subsequent release of  
8 their hazardous contents makes exposure to wildlife and the  
9 environment likely. Weather-spread lead contamination can  
10 potentially contaminate the local ecosystem and aquifers.

11  
12 CONCLUSIONS OF LAW

13 Based on the foregoing Findings, U.S. EPA has concluded  
14 that:

15 10. A&W Smelters and Refiners is a "person" as defined  
16 by Section 101(21) of CERCLA, 42 U.S.C. Section 9601(21).

17 11. John A. Alexander is a "person" as defined by  
18 Section 101(21) of CERCLA, 42 U.S.C. Section 9601(21).

19 12. Daryl Westerfeld is a "person" as defined by  
20 Section 101(21) of CERCLA, 42 U.S.C. Section 9601(21).

21 13. John A. Alexander is a person who by contract,  
22 agreement, or otherwise arranged for disposal or treatment, or  
23 arranged with a transporter for transport for disposal or  
24 treatment, of hazardous substances owned or possessed by such  
25 person, by any other party or entity, at any facility or

1 incineration vessel owned or operated by an other party or entity  
2 and containing such hazardous substances.

3 14. A&W is a person who by contract, agreement, or  
4 otherwise arranged for disposal or treatment, or arranged with a  
5 transporter for transport for disposal or treatment, of hazardous  
6 substances owned or possessed by such person, by any other party  
7 or entity, at any facility or incineration vessel owned or  
8 operated by an other party or entity and containing such  
9 hazardous substances.

10 15. Daryl Westerfeld A&W is a person who by contract,  
11 agreement, or otherwise arranged for disposal or treatment, or  
12 arranged with a transporter for transport for disposal or  
13 treatment, of hazardous substances owned or possessed by such  
14 person, by any other party or entity, at any facility or  
15 incineration vessel owned or operated by an other party or entity  
16 and containing such hazardous substances.

17 16. The Respondents are therefore liable persons under  
18 Section 107(a) of CERCLA, 42 U.S.C. Section 9607.

19 17. Lead is a "hazardous substances" as defined by  
20 Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14).

21 18. The approximately 543 drums in question are  
22 hazardous substances as defined by Section 101(14) of CERCLA, 42  
23 U.S.C. Section 9601(14).

24 19. The abandonment of the approximately 543 drums in  
25 question constitutes an actual or threatened "release" as that

1 term is defined in Section 101(22) of CERCLA, 42 U.S.C. Section  
2 9601(22).

### 3 DETERMINATIONS

4 Based on the Findings of Fact and Conclusions of Law,  
5 the Director, Hazardous Waste Management Division, EPA Region IX,  
6 has made the following determinations:

7 20. The actual or threatened release of hazardous  
8 substances from the Facility may present an imminent and  
9 substantial endangerment to the public health or welfare or the  
10 environment.

11 21. The actions required by this Order, if properly  
12 performed, are consistent with the National Contingency Plan  
13 ("NCP"), 40 CFR Part 300 and CERCLA; and are appropriate to  
14 protect the public health or welfare or the environment.

15 22. The material constitutes a threat to public health  
16 or welfare or the environment based upon consideration of the  
17 factors set forth in the NCP at 40 CFR section 300.415(b). These  
18 factors include, but are not limited to, the following:

- 19 **a. actual or potential exposure to hazardous substances**  
20 **by nearby populations, animals, or food chain;**

21 The abandonment of the drums may lead to a release of lead, a  
22 hazardous substance that may adversely impact the local  
23 community.



1           b.    hazardous substances in drums, barrels, tanks, or other  
2 bulk storage containers, that may pose a threat of release;

3 This factor is present due to the abandonment of approximately  
4 543 drums (3 trailers at the U.S Customs facility and 4 at the  
5 L&Z Truck facility

6           c.    weather conditions that may cause hazardous substances  
7                to migrate or be released;

8 In the event of a release, due to abandonment, wind and rain may  
9 cause additional migration of lead.

10                               ORDER

11           Based upon the foregoing Findings, Conclusions, and  
12 Determinations, and pursuant to Section 106(a) of CERCLA, 42  
13 U.S.C. Section 9606(a), it is hereby Ordered that the Respondent  
14 undertakes the following actions under the direction of EPA's On-  
15 Scene Coordinator.

16               23. By 5:00 p.m., Saturday, January 16, 1993, the  
17 Respondent shall contact Robert Bornstein through the EPA  
18 Emergency Spill Line at (415) 744-2000. The Respondent shall  
19 request to speak to the EPA Duty Officer who will put Respondent  
20 in touch with Mr. Bornstein. The Respondent shall then notify  
21 EPA of their intentions to assume responsibility for the storage  
22 of the approximately 543 drums staged at Appropriate Technologies  
23 II, Chula Vista, California. The Respondents shall assume all

1 financial responsibilities for the storage of the drums  
2 commencing starting on January 14, 1993.

3 24. Within thirty (30) days upon receipt of this Order,  
4 the respondents shall arrange for and conduct the transportation  
5 and disposal of the approximately 543 drums staged at Appropriate  
6 Technologies II, Chula Vista, California. The Respondents shall  
7 utilize Department of Transportation and State of California  
8 approved hazardous waste transporters. Disposal shall be  
9 arranged with an EPA-approved and permitted facility that is in  
10 compliance with EPA Off-Site Policy (OSWER Directive 9834.11,  
11 November 13, 1987) in accordance with CERCLA Section 121(d)(3),  
12 42 U.S.C. §9621(d)(3). EPA must provide the Respondents written  
13 approval and acceptance to the Respondents prior to any  
14 transportation or disposal of the drums.

15 25. All work must be in compliance with EPA's Standard  
16 Operating Safety Guide, dated November, 1984, and updated July,  
17 1988, and with the Occupational Safety and Health Administration  
18 ("OSHA") regulations applicable to Hazardous Waste Operations and  
19 Emergency Response, 29 CFR Part 120.

20 26. All work shall be performed by qualified contractor  
21 to undertake and complete the requirements of this Order. The  
22 Respondents shall notify U.S. EPA of the name of such contractor  
23 within two (2) days of the effective date of this Order. U.S.  
24 EPA retains the right to disapprove of any, or all, of the  
25 contractors and/or subcontractors retained by the Respondent. In

1 the event U.S. EPA disapproves of a selected contractor, the  
2 Respondent shall retain a different contractor to perform the  
3 work, and such selection shall be made within two (2) business  
4 days following U.S. EPA's disapproval.

5 27. The Respondent shall provide EPA with written  
6 weekly summary reports. These reports should contain a summary  
7 of the previous week's activities and planned up-coming events.  
8 The weekly reports shall also contain any hazardous waste  
9 manifests generated during site activities.

10 28. EPA shall be informed at least forty-eight (48)  
11 hours prior to any on-Site work.

12 29. All sampling and analysis shall be consistent with  
13 the "Quality Assurance/Quality Control Guidance for Removal  
14 Activities": "Sampling QA/QC Plan and Data Validation  
15 Procedures," EPA OSWER Directive 9360.4-01, dated April, 1990.

16 30. On or before the effective date of this Order, the  
17 Respondent shall designate a Project Coordinator. To the  
18 greatest extent possible, the Project Coordinator shall be  
19 present on site or readily available during site work. The U.S.  
20 EPA has designated Robert E. Bornstein, as its On-Scene  
21 Coordinator. The On-Scene Coordinator and the Project  
22 Coordinator shall be responsible for overseeing the  
23 implementation of this Order. To the maximum extent possible,  
24 communication between the Respondent and the U.S. EPA, and all  
25 documents, reports, and approvals, and all other correspondence

1 concerning the activities relevant to this Order, shall be  
2 directed through the On-Scene Coordinator and the Project  
3 Coordinator.

4 31. The U.S. EPA and the Respondent shall each have  
5 the right to change their respective designated On-Scene  
6 Coordinator or Project Coordinator. U.S. EPA shall notify the  
7 Respondent, and Respondent shall notify U.S. EPA, as early as  
8 possible before such a change is made, but in no case less than  
9 24 hours before such a change. Notification may initially be  
10 verbal, but shall promptly be reduced to writing.

11 32. The U.S. EPA On-Scene Coordinator shall have the  
12 authority vested in an On-Scene Coordinator by the NCP, 40 CFR  
13 Part 300, as amended, including the authority to halt, conduct,  
14 or direct any work required by this Order, or to direct any other  
15 response action undertaken by U.S. EPA or the Respondent at the  
16 facility.

17 33. No extensions to the above time frames shall be  
18 granted without sufficient cause. All extensions must be  
19 requested, in writing, and shall not be deemed accepted unless  
20 approved, in writing, by U.S. EPA.

21 34. All instructions by the U.S. EPA On-Scene  
22 Coordinator or his designated alternate shall be binding upon the  
23 Respondent as long as those instructions are not clearly  
24 inconsistent with the National Contingency Plan.

1           35. To the extent that the Facility or other areas  
2 where work under this Order is to be performed is owned by, or in  
3 possession of, someone other than the Respondent, the Respondent  
4 shall obtain all necessary access agreements. In  
5 the event that after using their best efforts Respondent is  
6 unable to obtain such agreements, Respondent shall immediately  
7 notify U.S. EPA.

8           36. The Respondent shall provide access to the  
9 Facility to U.S. EPA employees, contractors, agents, and  
10 consultants at reasonable times, and shall permit such persons to  
11 be present and move freely in the area in order to conduct  
12 inspections, including taking photographs and videotapes of the  
13 Facility, to do cleanup/stabilization work, to take samples to  
14 monitor the work under this Order, and to conduct other  
15 activities which the U.S. EPA determines to be necessary.

16           37. Nothing contained herein shall be construed to  
17 prevent U.S. EPA from seeking legal or equitable relief to  
18 enforce the terms of this Order, or from taking other legal or  
19 equitable action as it deems appropriate and necessary, or from  
20 requiring the Respondent in the future to perform additional  
21 activities pursuant to CERCLA, 42 U.S.C. Section 9601, et seq.,  
22 or any other applicable law.

23           38. The provisions of this Order and the directions of  
24 the On-Scene Coordinator shall be binding on the employees,  
25 agents, successors, and assigns of the Respondent.

1           39. Except where this Order specifically provides  
2 otherwise, its obligations shall be effective one (1) calendar  
3 days following issuance unless a conference is requested as  
4 provided herein. If a conference is requested, this Order shall  
5 be effective on one (1) calendar day following the day  
6 of the conference unless modified in writing by U.S. EPA.

7           40. Within twenty-four (24) hours of receipt of this  
8 Order, the Respondent shall provide notice, verbally or in  
9 writing, to U.S. EPA stating their intention to comply with the  
10 terms of this Order. Verbal notification must be followed in  
11 writing within three (3) calendar days. In the event the  
12 Respondent fails to provide such notice, the Respondent shall be  
13 deemed not to have complied with the terms of this Order.

14           41. The Respondent shall retain copies of all records  
15 and files relating to hazardous substances found on the site for  
16 six years following completion of the activities required by this  
17 Order and shall make them available to the U.S. EPA prior to the  
18 termination of the removal activities under this Order.

19           42. The Respondent shall submit a final report  
20 summarizing the actions taken to comply with this Order. The  
21 report shall contain, at a minimum: identification of the  
22 facility, a description of the locations and types of hazardous  
23 substances encountered at the facility upon the initiation of  
24 work performed under this Order, a chronology and description of  
25 the actions performed (including both the organization and

1 implementation of response activities), a listing of the  
2 resources committed to perform the work under this Order  
3 (including financial, personnel, mechanical, and technological  
4 resources), identification of all items that affected the actions  
5 performed under the Order and discussion of how all problems were  
6 resolved, a listing of quantities and types of materials removed  
7 from the facility, a discussion of removal and disposal options  
8 considered for any such materials, a listing of the ultimate  
9 destination of those materials, and a presentation of the  
10 analytical results of all sampling and analyses performed and  
11 accompanying appendices containing all relevant paperwork accrued  
12 during the action (e.g., manifests, invoices, bills, contracts,

permits). The final report shall also include an affidavit from a person who supervised or directed the preparation of that report. The affidavit shall certify under penalty of law that based on personal knowledge and appropriate inquiries of all other persons involved in preparation of the report, the information submitted is true, accurate, and complete to the best of the affiant's knowledge and belief. The report shall be submitted within 30 days of completion of the work required by the U.S. EPA.

43. All notices, reports, and requests for extensions submitted under terms of this Order shall be sent by certified mail, return receipt requested, and addressed to the following:



1                   one copy   Robert E. Bornstein  
2                               On Scene Coordinator  
3                               75 Hawthorne Street  
4                               San Francisco, CA 94105  
5                               (415) 744-2298  
6

7                   one copy   Terry Brubaker, Section Chief  
8                               Emergency Response Section  
9                               75 Hawthorne Street  
10                              San Francisco, CA 94105  
11                              (415) 744-2293

12                  one copy   John Rothman  
13                               Assistant Regional Counsel  
14                               U.S. EPA (RC-5) Office of Regional Counsel  
15                               75 Hawthorne Street  
16                               San Francisco, CA 94105  
17                               (415) 744-1353

18                  44. If any provision of this Order is deemed invalid  
19                  or unenforceable, the balance of this Order shall remain in full  
20                  force and effect.

21                               ACCESS TO ADMINISTRATIVE RECORD

22                  45. The Administrative Record supporting the selection  
23                  of the response action for this site will be available for review  
24                  on normal business days between the hours of 9:00 a.m. and 5:00  
25                  p.m. in the Office of Regional Counsel, United States  
26                  Environmental Protection Agency, Region IX, 75 Hawthorne Street,  
27                  16th Floor, San Francisco, California. Please contact John  
28                  Rothman, Assistant Regional Counsel, at (415) 744-1353 to review  
29                  the Administrative Record.

30                               OPPORTUNITY TO CONFER

1           46. With respect to the actions required above, the  
2 Respondent may within twenty-four (24) hours after issuance of  
3 this Order, request a conference with the U.S. EPA. Any such  
4 conference shall be held within three (3) calendar days from the  
5 date of request unless extended by mutual agreement of the  
6 parties. At any conference held pursuant to the request, the  
7 Respondent may appear in person, or be represented by an attorney  
8 or other representative. If the Respondent desires such a  
9 conference, the Respondent shall contact John Rothman, Assistant  
10 Regional Counsel, at (415) 744-1353.

11           47. If such a conference is held, the Respondent may  
12 present any evidence, arguments or comment regarding this Order,  
13 its applicability, any factual determinations upon which the  
14 actions Order is based, the appropriateness of any action which  
15 the Respondent is ordered to take, or any other relevant and  
16 material issue. Any such evidence, arguments or comments should  
17 be reduced to writing and submitted to U.S. EPA within 10  
18 calendar days following the conference. If no conference is  
19 requested, any such evidence, arguments or comments must be  
20 submitted in writing within three (3) calendar days following the  
21 issuance of this Order. Any such writing should be directed to  
22 John Rothman, Assistant Regional Counsel, at the address cited  
23 above.

24           48. The Respondent is hereby placed on notice that  
25 U.S. EPA will take any action which may be necessary in the

1 opinion of U.S. EPA for the protection of public health and  
2 welfare and the environment, and Respondent may be liable under  
3 Section 107(a) of CERCLA, 42 U.S.C. Section 9607(a), for the  
4 costs of those government actions.


5 PENALTIES FOR NONCOMPLIANCE

6 49. The Respondent is advised pursuant to Section  
7 106(b) of CERCLA, 42 U.S.C. Section 9606(b), that willful  
8 violation or subsequent failure or refusal to comply with this  
9 Order, or any portion thereof, may subject the Respondent to a  
10 civil penalty of up to \$25,000 per day for each day in which such  
11 violation occurs, or such failure to comply continues. Failure  
12 to comply with this Order, or any portion thereof, without  
13 sufficient cause may also subject the Respondent to liability  
14 for punitive damages in an amount three times the amount of  
15 any cost incurred by the government as a result of the failure of  
16 the Respondent to take proper action, pursuant to Section  
17 107(c)(3) of CERCLA, 42 U.S.C. Section 9607(c)(3).

18 THIS ORDER IS ISSUED on this 15th day of January, 1993.

19 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

20 By:

21   
22 Jeff Zelikson, Director  
23 Hazardous Waste Management Division  
24 United States Environmental  
Protection Agency Region IX

Contacts:

Robert E. Bornstein  
On Scene Coordinator  
Emergency Response Section (H-8-3)  
United States Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

William J. Weis III  
Investigations and Enforcement  
Removal Enforcement Section (H-8-4)  
United States Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

John Rothman  
Assistant Regional Counsel (RC-3-2)  
Office of Regional Counsel  
United States Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

Diane C. Bodine  
Off-Site Policy Coordinator (H-4-3)  
United States Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

ATTACHMENT A

INDEX TO ADMINISTRATIVE RECORD

- 1) Southern California Laboratory Report: 12-22-92  
for County of San Diego Samples Collected 11-19-92  
(Enforcement Confidential)

Guidance Documents by Reference

- 2) Guidance Document: Superfund Removal Procedures #3, OSWER #9360.0-038, 02/01/88 (HQ# 1006).
- 3) Guidance Document: Removal Cost Management Manual (Secondary Reference), OSWER #9360.0-028, 04/01/88 (HQ# 6001).
- 4) Guidance Document: Land Disposal Restrictions, 08/11/87 (HQ# 2204).
- 5) Guidance Document: Emergency Response Cleanup Services Contracts (ERCS), Users' Manual, 10/01/82 (RC# 9006).
- 6) Guidance Document: National Oil & Hazardous Substances Pollution Contingency Guidance, Part 300, 40 CFR CH. 1 (3-8-90 Edition), pp. 664-755, 03/08/90 (RC# 9038).
- 7) Guidance Document: Superfund Amendments & Reauthorization Act of 1986 (SARA), 10/17/86 (RC# 90100).
- 8) Guidance Document: Interim Guidance on Administrative Records for Selection of CERCLA Response Actions, OSWER 9833.3A, 03/01/89 (RC# 9013).
- 9) Guidance Document: Superfund LDR Guide #7: Determining When Land Disposal Restrictions (LDR's) are "Relevant and Appropriate" to CERCLA Response Actions, OSWER 93347.3-08FS, 12/01/89 (HQ# 2220).1.